

DOCKET NO.: HHD-CV-22-6160014-S : SUPERIOR COURT  
THERESA SAVINELLI : J.D. OF HARTFORD  
V. : AT HARTFORD  
ST. JOHN'S HOUSING :  
CORPORATION, ET AL : NOVEMBER 29, 2022

**PLAINTIFF'S DISCLOSURE OF EXPERT WITNESSES**

The plaintiff, **THERESA SAVINELLI**, hereby gives notice of her disclosure of expert witnesses who may testify at trial.

**Names, Addresses and Employers**

**Middlesex Hospital Personnel  
28 Crescent Street  
Middletown, CT**

**Dr. Andrew Litchfield, Hartford Orthopedic Surgeons  
1111 Cromwell Avenue  
Rocky Hill, CT**

**Dr. Ayman Latif, Connecticut Foot Care Centers  
535 Saybrook Road  
Middletown, CT**

In addition, the plaintiff reserves the right to and may elicit opinions upon cross-examination of any expert witnesses called by the defendant at trial.

**Subject Matter**

The general subject matter upon which the medical experts will testify includes the medical condition of the plaintiff; examinations, findings and diagnosis; the nature and extent of the plaintiff's injuries; the causation of those injuries; treatment; recommendations; the plaintiff's prognosis; future treatment and the cost of same; and permanency.

### **Substance of the Facts and Opinions**

#### **Middlesex Hospital Personnel**

Evidence is expected to relate to plaintiff's physical condition when they presented in the hospital for treatment on October 17, 2021. Evidence or testimony will include the nature of plaintiff's injuries and the treatment given, including the nature and results of objective and diagnostic tests conducted. The personnel will testify substantially in accordance with the medical records/reports that have been supplied to the defense through discovery.

#### **Dr. Andrew Litchfield, Hartford Orthopedic Surgeons**

Dr. Litchfield will testify regarding his examination and treatment of plaintiff. It is expected that Dr. Litchfield will testify in accordance with his treatment notes and evaluation and consultation reports that have been provided through discovery. Evidence or testimony will include the nature and extent of the plaintiff's injuries, causation, prognosis and permanency. Dr. Litchfield will testify that the injuries the plaintiff suffered were directly related to the accident of October 14, 2021, and are permanent. These injuries include: left foot pain, left ankle pain, sprain of deltoid ligament of left ankle and left ankle deltoid ligament injury and possible avulsion fracture. Dr. Litchfield is expected to testify that his treatment of the plaintiff for injuries sustained in the October 14, 2021, accident, as more fully described in his medical reports and records, was both reasonable and necessary.

**Dr. Ayman Latif, Connecticut Foot Care Centers**

Dr. Latif will testify regarding his examination and treatment of plaintiff. It is expected that Dr. Latif will testify in accordance with his treatment notes and evaluation and consultation reports that have been provided through discovery. Evidence or testimony will include the nature and extent of the plaintiff's injuries, causation, prognosis and permanency. Dr. Latif will testify that the injuries the plaintiff suffered were directly related to the accident of October 14, 2021, and are permanent. These injuries include: left foot pain, left foot injury and tendonitis. Dr. Latif is expected to testify that his treatment of the plaintiff for injuries sustained in the October 14, 2021, accident, as more fully described in his medical reports and records, was both reasonable and necessary.

**Summary of the Grounds for Each Opinion**

The medical witnesses' opinions will be based upon examination and treatment of the plaintiff; interviews with the plaintiff; and review of medical records and reports and diagnostic test results; and upon their knowledge, education, experience and training.

THE PLAINTIFF,  
THERESA SAVINELLI

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**CERTIFICATION**

I certify that a copy of this document was or will immediately be mailed or delivered electronically or non-electronically on November 29, 2022 to all attorneys and self-represented parties of record and to all parties who have not appeared in this matter and that written consent for electronic delivery was received from all attorneys and self-represented parties receiving electronic delivery.

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Daren R. Altieri